

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION GULFPORT**

REPUBLICAN NATIONAL COMMITTEE;  
MISSISSIPPI REPUBLICAN PARTY; JAMES  
PERRY; and MATTHEW LAMB,

Plaintiffs,

v.

JUSTIN WETZEL, *in his official capacity as  
the clerk and registrar of the Circuit Court of  
Harrison County*; TONI JO DIAZ, BECKY  
PAYNE, BARBARA KIMBALL, CHRISTENE  
BRICE, and CAROLYN HANDLER, *in their  
official capacities as members of the Harrison  
County Election Commission*; and MICHAEL  
WATSON, *in his official capacity as the  
Secretary of State of Mississippi*,

Defendants,

VET VOICE FOUNDATION and  
MISSISSIPPI ALLIANCE OF RETIRED  
AMERICANS,

Intervenor-Defendants.

No. 1:24-cv-00025-LG-RPM  
(Lead Case)

**REPUBLICAN PLAINTIFFS'  
MOTION FOR SUMMARY  
JUDGMENT**

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LIBERTARIAN PARTY OF MISSISSIPPI,

Plaintiff,

v.

JUSTIN WETZEL, *in his official capacity as  
the clerk and registrar of the Circuit Court of  
Harrison County, et al.*,

Defendants.

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No. 1:24-cv-00037-LG-RPM  
(Consolidated Case)

Plaintiffs in case No. 1:24-cv-25—the Republican National Committee, the Mississippi Republican Party, James Perry, and Matthew Lamb—move for summary judgment under Federal Rule of Civil Procedure 56. Plaintiffs seek summary judgment on all claims in their complaint and a permanent injunction prohibiting Defendants from counting mail-in ballots received after election day. In support of their motion, Plaintiffs attach the declarations of Ashley Walukevich (attached as Exh. A), Frank Bordeaux (attached as Exh. B), James Perry (attached as Exh. C), and Matthew Lamb (attached as Exh. D). For the reasons explained in the memorandum accompanying this motion, Mississippi Code §23-15-637(1)(a) violates federal law, and the Court should enter judgment in favor of Plaintiffs on each count in the complaint.

Dated: March 26, 2024

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Respectfully submitted,

s/ Spencer M. Ritchie

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No. 1:24-cv-25*

**CERTIFICATE OF SERVICE**

I certify that on March 26, 2024, the foregoing document was filed on the Court's CM/ECF system, which notifies all counsel of record.

*s/ Spencer M. Ritchie*

Spencer M. Ritchie  
*Counsel for Plaintiffs in Case  
No. 1:24-cv-25*